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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,))
v.) No. 4:22-CR-00062-HEA-PLC
HUSSEIN KHALAF,)
Defendant.)

MOTION TO ALLOW UNDERSIGNED COUNSEL ACCESS TO SEALED DOCUMENTS FILED BY DEFENDANT

NOW COMES Defendant HUSSEIN KHALAF, through counsel, Mohammed G. Ahmed, Assistant Federal Public Defender, and requests this Honorable Court to grant current counsel access to two sealed docket entries that purport to be letters sent by the Defendant to the Court.

Defendant has directed the undersigned to file a motion to withdraw his guilty plea and asserts that those sealed letters (Docs. 64 and 86) contain pertinent information material to the issue of a whether a fair and just reason exists to withdraw the plea.

WHEREFORE, for the reasons stated above, counsel this Honorable Court to grant current counsel access to two sealed docket entries, Documents 64 and 86.

Dated: March 29, 2023

Respectfully submitted,

/s/Mohammed G. Ahmed MOHAMMED G. AHMED Assistant Federal Public Defender Bar No. 6285612 IL 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255

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E-mail: Mohammed_Ahmed@fd.org ATTORNEY FOR DEFENDANT Case: 4:22-cr-00062-HEA Doc. #: 109 Filed: 03/29/23 Page: 3 of 3 PageID #: 351

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Colleen Lang, Assistant United States Attorney.

/s/ Mohammed G. Ahmed MOHAMMED G. AHMED Assistant Federal Public Defender